

**ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

IN THE MATTER OF:

**Seoyon E Hwa Interior Systems Alabama LLC
Selma, Dallas County, Alabama
USEPA ID NUMBER ALR000038893**

ORDER NO. 16-XXX-HW

FINDINGS

Pursuant to the provisions of the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-16, as amended, and the Alabama Hazardous Wastes Management and Minimization Act (hereinafter “AHWMMA”), Ala. Code §§ 22-30-1 to 22-30-24, as amended, and the regulations promulgated pursuant thereto, the Alabama Department of Environmental Management (hereinafter “ADEM” or “the Department”) makes the following FINDINGS:

1. Seoyon E Hwa Interior Systems Alabama LLC (hereinafter “Seoyon E Hwa”) operates an injection molding and painting facility with EPA Identification Number ALR000038893, located at 200 Craig Industrial Drive in Selma, Dallas County, Alabama (hereinafter “the Site”). Seoyon E Hwa notified the Department of large quantity generator activities on January 12, 2016.

2. The Department is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 to 22-22A-16, as amended.

3. Pursuant to Ala. Code § 22-22A-4(n) (2006 Rplc. Vol.), the Department is the state agency responsible for the promulgation and enforcement of solid and hazardous waste regulations in accordance with the federal Solid Waste Disposal Act §§ 1002 to 11012, 42 U.S.C. §§ 6901 to 6992k, as amended. In addition, the Department is authorized to administer and enforce the provisions of the AHWMMA, Ala. Code §§ 22-30-1 to 22-30-24, as amended.

4. On February 25, 2016, representatives of the U. S. Environmental Protection Agency - Region 4 and of the Department's Industrial Hazardous Waste Branch conducted a compliance evaluation inspection (hereinafter "CEI") of Seoyon E Hwa. The CEI and a review of Seoyon E Hwa's compliance showed the following:

- a) Pursuant to ADEM Admin. Code r. 335-14-3-.01(2), a person who generates a solid waste, as defined in 335-14-2-.01(2), must make a hazardous waste determination.

Seoyon E Hwa did not make hazardous waste determinations on the following waste:

- 1. One fluorescent light fixture in the Laydown Yard;
- 2. About three dozen fluorescent lamps located in the Laydown Yard, the Maintenance Area, and the Electrical Room;
- 3. Eight high intensity discharge light fixtures located in the Laydown Yard, the Maintenance Area, and the Electrical Room;
- 4. Four cans of enamel paint located in the Laydown Yard and the Maintenance Area;
- 5. A pile of discarded construction material located behind the Laydown Yard; and
One discarded aerosol can of lacquer paint located in the Maintenance Area.

- b) Pursuant to ADEM Admin. Code r. 335-14-3-.01(4)(a), a large quantity generator must submit a correct and complete ADEM Form 8700-12 (including all appropriate attachment pages and fees) reflecting current waste activities to the Department annually.

Seoyon E Hwa did not submit a correct and complete ADEM Form 8700-12, *Notification of Regulated Waste Activity*, to the Department on January 12, 2016. In the aforementioned notification, Seoyon E Hwa informed the Department that it only generates hazardous waste that exhibits the characteristic of ignitability (D001). However, a review of information collected during the inspection revealed Seoyon Hwa generates more than 300 gallons of used oil per year and hazardous wastes that carry the following hazardous waste codes: D001 (ignitability); D005 (Barium); D006

(Cadmium); and D007 (Chromium); and F003 and F005 (spent halogenated solvents).

- c) Pursuant to ADEM Admin. Code r. 335-14-3-.04(1)(e), a large quantity generator who offers hazardous waste for transportation off-site must have a program in place to reduce the volume and toxicity of such waste to the degree determined by the generator to be economically practicable and must document this program in a written waste minimization plan.

Seoyon E Hwa did not have written waste minimization plan.

- d) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4., referencing ADEM Admin. Code r. 335-14-6-.02(7)(d), the generator must maintain the following documents and records at the facility:

- a. Job titles for the positions related to hazardous waste management and the name of employees filling each job title;
- b. A written job description for the positions related to hazardous waste management, which includes the requisite skills, education or other qualifications, and duties related to hazardous waste management;
- c. A written description of both introductory training and continuing training required for each position; and
- d. Records that document that the required training or job experience have been given to, and completed by, facility personnel.

Seoyon E Hwa did not furnish for review documents or records demonstrating that it had provided its employees that handle hazardous waste with initial and/or annual training.

- e) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4., referencing ADEM Admin. Code r. 335-14-6-.04(6), at all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all

emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout.

Seoyon E Hwa did not ensure that a person qualified to act as emergency coordinator was either on the facility premises or on call at the time of the inspection. Seoyon E Hwa had designated its Safety Specialist, the Human Resources Manager, and the Maintenance Manager as the primary and alternate emergency coordinators, respectively. However, none of these employees had received hazardous waste management training. The Human Resources Manager and Maintenance Manager, who were on-site during the inspection, were not familiar with the contingency plan. Moreover, the Human Resources Manager was not aware that he was an alternate emergency coordinator.

- f) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1(i), referencing ADEM Admin. Code r. 335-14-6-.09(5), a generator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration of containers and the containment system caused by corrosion or other factors; and must note the number and capacity of hazardous waste containers present; and must document these inspection in accordance with rule 335-14-6-.02(6)(d). ADEM Admin. Code r. 335-14-6-.02(6)(d) requires the generator to record inspection in an inspection log or summary.

A review of Seoyon E Hwa's weekly inspection logs revealed several weeks when no inspections were documented.

- g) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(ii), a generator may accumulate as much as 55 gallons of hazardous waste at or near the point of generation without a permit and without complying with 335-14-3-.03(5)(a), provided that the containers are marked either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Seoyon E Hwa did not mark one 55-gallon satellite container of paint and solvent waste located in the Paint Area and one 55-gallon open-top drum holding intact aerosol cans located in the Laydown Yard with either the words "Hazardous Waste" or with other words describing their contents.

- h) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(ii), referencing ADEM Admin. Code r. 335-14-6-.09(2), if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the generator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of 335-14-6.

The aforementioned satellite container of aerosol cans was severely rusted.

- i) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(ii), referencing ADEM Admin. Code r. 335-14-6-.09(4)(a), a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Seoyon E Hwa did not keep closed the aforementioned satellite container. At the time of the inspection, no waste was being added to or removed from the container.

- j) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)3., a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit, provided that containers and tanks labeled or marked clearly with the words "Hazardous Waste" and the EPA hazardous waste number(s).

Seoyon E Hwa did not mark or label two 55-gallon drums in the hazardous waste storage area with the words "Hazardous Waste" or the appropriate EPA hazardous waste number(s).

- k) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)2., a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit, provided that the date when the accumulation begins is clearly marked and visible for inspection on

each container.

Seoyon E Hwa did not mark two drums in the hazardous waste storage area with an accumulation start date.

- l) Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1., containers used to store used oil at used oil generator locations must be labeled or marked clearly with the words "Used Oil".

Seoyon E Hwa did not label or mark seven 55-gallon drums of used oil with the words "Used Oil".

- m) Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d), upon detection of a release of used oil to the environment that is not subject to the corrective action requirements of Division 335-6, Volume 2 of the ADEM Administrative Code, a used oil generator must stop the release; contain the released used oil; and clean up and manage properly the released used oil and other materials in accordance with all applicable Division 335-13 and 335-14 requirements.

Seoyon E Hwa did not clean up released used oil on the ground at the base of three used oil drums in the Laydown Yard.

5. On May 5, 2016, representatives of the U. S. Environmental Protection Agency - Region 4 and of the Department's Industrial Hazardous Waste Branch conducted a follow up inspection (hereinafter "FUI") of Seoyon E Hwa. The FUI and a review of Seoyon E Hwa's compliance showed the following:

- n) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)2., a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit, provided that the date when the accumulation begins is clearly marked and visible for inspection on each container.

Seoyon E Hwa did not stage one 55-gallon drum in the HWSA so that the accumulation start date was visible for inspection.

- o) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1.(i), referencing ADEM Admin. Code r. 335-14-6-.09(4)(a), a large quantity generator may accumulate hazardous waste which is generated on-site for 90 days or less without a permit or without having interim status, provided that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste.

Seoyon E Hwa did keep closed two drums of paint-related hazardous waste located in the HWSA. One drum had bung cap that was placed in the bung hole but was not fully engaged with the threads. The other drum was equipped with a pouring funnel that was not latched. Waste was not being added or removed from the drums at the time of the inspection.

- p) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1.(i), referencing ADEM Admin. Code r. 335-14-6-.09(6)(b)2., a large quantity generator may accumulate hazardous waste which is generated on-site for 90 days or less without a permit or without having interim status, provided that the waste is stored in container storage areas that have a containment system. The containment system must have a base which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

Seoyon E Hwa did not provide adequate secondary containment in its HWSA. The floor of the HWSA was covered by metal plates that were bolted or screwed to the floor. There were visible gaps between the metal floor plates and many indications that paint or similar material had been spilled in the past. Facility personnel were unable to explain how they would or could inspect the underlying floor to ensure it was free of gaps or cracks.

- q) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4., referencing ADEM Admin. Code r. 335-14-6-.03(4), a large quantity generator may accumulate hazardous waste which is generated on-site for 90 days or less without a permit or without having interim status, provided that all facility communications or alarm systems, fire protection

equipment, spill control equipment, and decontamination equipment, where required, is tested and maintained as necessary to assure its proper operation in time of emergency.

Seoyon E Hwa did not test and maintain all fire protection equipment at the site. The two fire extinguishers in the HWSA had not been inspected or maintained since October of 2014.

- r) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4., referencing ADEM Admin. Code r. 335-14-6-.02(5)(c), a large quantity generator may accumulate hazardous waste which is generated on-site for 90 days or less without a permit or without having interim status, provided that a sign with the legend, "Danger--Unauthorized Personnel Keep Out", must be posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion.

Seoyon E Hwa did not mark all approaches to the HWSA with the required signage. The personnel door leading to the HWSA was marked with the required warning sign, but the adjacent roll up door lacked any signage.

- s) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(ii), referencing ADEM Admin. Code r. 335-14-6-.09(4)(a), a generator may accumulate as much as 55 gallons of hazardous waste at or near the point of generation without a permit and without complying with 335-14-3-.03(5)(a), provided that the containers are kept closed, except when it is necessary to add or remove waste.

Seoyon E Hwa did not keep closed an open corrugated cardboard box and an open 55-gallon drum (both satellite containers) holding spent/waste aerosol cans located at the Main Building. (This violation was corrected during the inspection.)

- t) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(ii), a generator may accumulate as much as 55 gallons of hazardous waste at or near the point of generation without a permit and without complying with 335-14-3-.03(5)(a), provided that the containers are

marked either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Seoyon E Hwa did not mark the abovementioned corrugated cardboard box of spent/waste aerosol cans and about twenty spent/waste aerosol cans placed in an unmarked trash can located in the Meadowcraft Building either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

- u) Pursuant to ADEM Admin. Code r. 335-14-11-.02(4)(d)1., a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Seoyon E Hwa did not keep closed one corrugated cardboard box of spent fluorescent lamps; the top flaps had been torn off.

- v) Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e), each lamp or a container or package in which the lamps are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste -- Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)".

Seoyon E Hwa did not mark the abovementioned corrugated cardboard box of spent fluorescent lamps with any of the required phrases.

- w) Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(c), a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Seoyon E Hwa did not have a method in place to document how long spent fluorescent lamps remained on-site. The abovementioned corrugated cardboard box of spent

fluorescent lamps was not dated, and employees were not able to demonstrate any other method used to track how long universal waste lamps remained at the facility.

- x) Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1., containers used to store used oil at used oil generator locations must be labeled or marked clearly with the words "Used Oil".

Seoyon E Hwa did not mark all containers of used oil with the words "Used Oil". In the Laydown Yard, one open-top 55-gallon drum of used oil was marked with the words "Waste Oil". At the Meadowcraft Building, two 55-gallon open-top drums holding used oil sorbents were not marked in any way.

- y) Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1., a container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Seoyon E Hwa did not keep closed all containers of used oil. In the Laydown Yard, the abovementioned open-top 55-gallon drum of used oil was not closed: a cover was placed over the drum, but had an opening in the center and was not secured to the drum. In the Meadowcraft Building, an open-top drum holding used oil sorbents was not closed. The open drum was covered with a square of plywood.

- z) Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d), upon detection of a release of used oil to the environment that is not subject to the corrective action requirements of Division 335-6, Volume 2 of the ADEM Administrative Code, a used oil generator must stop the release; contain the released used oil; and clean up and manage properly the released used oil and other materials in accordance with all applicable Division 335-13 and 335-14 requirements.

Seoyon E Hwa did not clean up a release of oil to the ground outside the Meadowcraft Building.

aa) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4., referencing ADEM Admin. Code r. 335-14-6-.04(3), a generator may accumulate hazardous waste on-site for 90 days or less without a permit, provided that the generator has a contingency plan which contains the following information:

- a. the actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water;
- b. a description of arrangements with local police departments, fire departments, hospitals, and state and local emergency response teams to coordinate emergency services;
- c. a list of the names, addresses, and phone numbers of all persons qualified to act as emergency coordinator;
- d. a list of all emergency equipment at the facility including the location, physical description, and a brief outline of its capabilities for each item on the list; and
- e. an evacuation plan for facility personnel that describes signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

Seoyon E Hwa failed to provide an adequate contingency plan. The site's contingency plan lacked the following elements: a description of arrangements with local police departments, fire departments, hospitals, and state and local emergency response teams; a list of all emergency equipment at the facility including the locations; and an evacuation plan for facility personnel that describes signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

bb) Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4., referencing ADEM Admin. Code r. 335-14-6-.02(7)(d), the generator must maintain the following documents and records at the facility:

- a. Job titles for the positions related to hazardous waste management and the name of employees filling each job title;
- b. A written job description for the positions related to hazardous waste management, which includes the requisite skills, education or other qualifications, and duties related to hazardous waste management; and
- c. A written description of both introductory training and continuing training required for each position

Seoyon E Hwa failed to maintain job descriptions that document the requisite skills, education or other qualifications, and duties related to hazardous waste management. Only the job description for one PCS Technician made any mention of hazardous waste management duties. None of the job descriptions include any descriptions of the type and amount of training required or the requisite skills, education, or other qualifications. In addition, the job descriptions for the Safety/Environmental Specialist (who is also the emergency coordinator) and the two individuals who act as alternate emergency coordinators include no mention of duties, qualifications, or training related to emergency response.

- cc) Pursuant to ADEM Admin. Code r. 335-14-3-.01(2), a person who generates a solid waste, as defined in 335-14-2-.01(2), must make a hazardous waste determination.

Seoyon E Hwa failed to make proper hazardous waste determinations on a pile of discarded construction debris and other discarded items, including two aerosol spray cans, observed at the rear and the side of the Meadowcraft Building and on wastewaters from the “waterfall” paint system. The waterfall paint system is cleaned with a mixture of toluene and xylene; waste water removed from this system is generally managed as non-hazardous waste, but it has occasionally been disposed as a characteristic and a listed hazardous waste (EPA hazardous waste numbers D001, D010, F003, and F005).

dd) Pursuant to ADEM Admin. Code r. 335-14-3-.04(2)(a), a generator who ships any hazardous waste off-site to a treatment, storage, or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the Department by March 1 of each even numbered year. The Biennial Report must be submitted on the Hazardous Waste Generator Biennial Report form supplied by the Department and must cover generator activities during the previous calendar year.

Seoyon E Hwa had not submitted a Biennial Report to the Department since September 9, 2014. The report was submitted on June 29, 2016, one hundred twenty days after the March 1 deadline.

6. As a result of this CEI, the Department issued to Seoyon E Hwa a Notice of Violation (dated June 22, 2016), which cited violations of the hazardous waste regulations that were discovered during the CEI.

7. On Month Day, 2016, the Department received Seoyon E Hwa's response to the aforementioned Notice of Violation.

8. Pursuant to Ala. Code § 22-22A-5(18), as amended, in determining the amount of any penalty, the Department must give consideration to the seriousness of the violation(s), including any irreparable harm to the environment and any threat to the health or safety of the public; the standard of care manifested by such person; the economic benefit which delayed compliance may confer upon such person; the nature, extent, and degree of success of such person's efforts to minimize or mitigate the effects of such violation(s) upon the environment; such person's history of previous violations; and the ability of such person to pay such penalty. Any civil penalty assessed pursuant to this authority shall not exceed \$25,000.00 for each violation, provided however, that the total penalty assessed in an order issued by the Department shall not exceed \$250,000.00. Each day such a violation continues shall constitute a separate violation. In arriving at the civil penalty assessed in this Order, the Department has considered the following:

(a) **SERIOUSNESS OF THE VIOLATIONS:** The Department noted thirty violations of ADEM Admin. Code div. 335-14 and the AHWMMMA. In arriving at the civil penalty, the Department considered the general nature and magnitude of the violations along with the available evidence of irreparable harm to the environment or threat to the public.

(b) **THE STANDARD OF CARE:** In considering the standard of care manifested by Seoyon E Hwa, the Department noted that many of the violations listed above are of non-technical requirements and were easily avoidable. Violations n), o), s), t), x), y), bb), and cc) reflect deficiencies the inspectors discovered during the February 25, 2016 CEI and again during the May 6, 2016 FUI. Furthermore, as of July 20, 2016, Seoyon E Hwa had still not obtained training for its employees that handle hazardous waste or for its emergency coordinators, twenty four days following the receipt of the Notice of Violation, and one hundred forty-six days since that deficiency was documented during the CEI. On June 16, 2014, the Department issued a Warning Letter to the facility for failure to submit a Biennial Report to the Department, a violation which was repeated in the very next reporting cycle. Seoyon E Hwa did not exhibit a standard of care commensurate with applicable regulatory standards.

(c) **ECONOMIC BENEFIT WHICH DELAYED COMPLIANCE MAY HAVE CONFERRED:** The Department has determined that there was no significant economic benefit gained by Seoyon E Hwa as a result of the violations referenced herein.

(d) **EFFORTS TO MINIMIZE OR MITIGATE THE EFFECTS OF THE VIOLATION UPON THE ENVIRONMENT:** There are no known environmental effects to mitigate as a result of the alleged violations.

(e) **HISTORY OF PREVIOUS VIOLATIONS:** Based on a review of Department records, Seoyon E Hwa has no recent history of noncompliance with respect to ADEM Admin. Code div. 335-14.

(f) **THE ABILITY TO PAY:** Seoyon E Hwa has not alleged an inability to pay the civil penalty.

(g) OTHER FACTORS: The Department has carefully considered the six statutory penalty factors enumerated in Ala. Code § 22-22A-5(18)c., as amended, as well as the need for timely and effective enforcement, and has concluded that the civil penalty is appropriate for the violations noted in this action (see Attachment A, which is made a part of the Department's Findings).

ORDER

Based on the foregoing FINDINGS and pursuant to Ala. Code, §§22-22A-5(10), 22-22A-5(18), 22-30-20, and 22-30-19(a) and (b), as amended, it is hereby ORDERED:

A. Seoyon E Hwa agrees to pay to the Department a civil penalty in the amount of \$19,650 in settlement of the violation alleged herein within forty five days from the effective date of this Consent Order. Failure to pay the civil penalty within forty five days from the effective date may result in the Department's filing a civil action in the Circuit Court of Montgomery County to recover the civil penalty.

B. Seoyon E Hwa agrees that all penalties due pursuant to this Consent Order shall be made payable to the Alabama Department of Environmental Management by certified or cashier's check or other payment methods acceptable to the Department and shall be remitted to:

Office of General Counsel

Alabama Department of Environmental Management

P.O. Box 301463

Montgomery, Alabama 36130-1463

C. Any payment submitted to the Department pursuant to this Order shall reference Seoyon E Hwa's name and address, and the ADEM Administrative Order number of this action.

D. That, should any provision of this Order be declared by a court of competent jurisdiction or the Environmental Management Commission to be inconsistent with Federal or

State law and, therefore, unenforceable, the remaining provisions hereof shall remain in full force and effect.

E. That the issuance of this Order does not preclude the Department from seeking criminal fines or other appropriate sanctions or relief against Seoyon E Hwa for the violation(s) cited herein.

F. That failure to comply with the provisions of this Order shall constitute cause for commencement of legal action by the Department against Seoyon E Hwa for recovery of additional civil penalties, criminal fines, or other appropriate sanctions or relief.

ORDERED and ISSUED this _____ day of _____, _____.

Lance R. LeFleur
Director

Attachment A
Seoyon E Hwa Interior Systems Alabama LLC
Selma, Dallas County
Facility ID No. ALR000038893

Violation	Number of Violations*	Seriousness of Violation*	Standard of Care*	History of Previous Violation*
Seoyon E Hwa failed to make hazardous waste determinations on six wastestreams generated at the site	6	\$600	\$600	\$0
Seoyon E Hwa failed to submit a correct and complete ADEM Form 8700-12, Notification of Regulated Waste Activity, to the Department.	1	\$100	\$100	\$0
Seoyon E Hwa failed to have a written waste minimization plan.	1	\$100	\$100	\$0
Seoyon E Hwa failed to provide training records.	1	\$1,000	\$500	\$0
Seoyon E Hwa failed to have a trained, qualified emergency coordinator at the facility or on call at all times	1	\$500	\$250	\$0
Seoyon E Hwa failed to conduct and document weekly inspections.	1	\$500	\$500	\$0

Seoyon E Hwa failed to mark 1 satellite container with the words "Hazardous Waste"	1	\$100	\$100	\$0
Seoyon E Hwa failed to ensure 1 satellite container was in good condition.	1	\$100	\$100	\$0
Seoyon E Hwa failed to keep closed 1 satellite container.	1	\$100	\$100	\$0
Seoyon E Hwa failed to mark 2 hazardous waste containers with the words "Hazardous Waste" & EPA hazardous waste number(s).	2	\$200	\$200	\$0
Seoyon E Hwa failed to mark 2 hazardous waste containers in storage with an accumulation start date.	2	\$400	\$400	\$0
Seoyon E Hwa failed to mark 7 used oil containers with the words "Used Oil".	7	\$700	\$100	\$0
Seoyon E Hwa failed to clean up a release of used oil.	1	\$200	\$200	\$0
Seoyon E Hwa failed to ensure the accumulation start date was visible for inspection on 1 hazardous waste container	1	\$200	\$400	\$0

Seoyon E Hwa failed to keep closed 2 hazardous waste containers in storage	2	\$200	\$400	\$0
Seoyon E Hwa failed to provide adequate secondary containment in the 90-day accumulation area	1	\$1,000	\$1,000	\$0
Seoyon E Hwa failed to test and maintain 2 fire extinguishers.	2	\$400	\$400	\$0
Seoyon E Hwa failed to post the required signs at the 90-day accumulation area.	1	\$100	\$100	\$0
Seoyon E Hwa failed to keep closed 2 satellite containers.	2	\$200	\$400	\$0
Seoyon E Hwa failed to mark 2 satellite containers with the words "Hazardous Waste".	2	\$200	\$400	\$0
Seoyon E Hwa failed to keep closed 1 container of universal waste lamps.	1	\$100	\$100	\$0
Seoyon E Hwa failed to mark 1 container of universal waste lamps	1	\$100	\$100	\$0
Seoyon E Hwa failed to document how long universal waste was accumulated	1	\$100	\$100	\$0

Seoyon E Hwa failed to mark 3 used oil containers	3	\$300	\$600	\$0	
Seoyon E Hwa failed to keep closed 2 used oil containers.	2	\$200	\$400	\$0	
Seoyon E Hwa failed to clean up a release of used oil to the ground	1	\$200	\$400	\$0	
Seoyon E Hwa failed to have an adequate contingency plan.	1	\$500	\$500	\$0	
Seoyon E Hwa failed to document all training-related information on job descriptions.	1	\$500	\$1,000	\$0	
Seoyon E Hwa failed to make an adequate hazardous waste determination on all wastes generated at the facility.	3	\$300	\$600	\$0	
Seoyon E Hwa failed to submit to the Department a Biennial Report during each even numbered year.	1	\$100	\$200	\$0	Total of Three Factors
TOTAL PER FACTOR		\$9,300	\$10,350	\$0	\$19,650

Adjustments to Amount of Initial Penalty	
Mitigating Factors (-)	\$0
Ability to Pay (-)	\$0
Other Factors (+/-)	\$0
Total Adjustments (+/-) Enter at Right	\$0

Economic Benefit (+)	\$0
Amount of Initial Penalty	\$19,650
Total Adjustments (+/-)	\$0
FINAL PENALTY	\$19,650